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**NEW YORK** 

September 20, 2013

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re:

Station KVMD(TV)

Twentynine Palms, California

FIN: 16729

Renewal of Streamlined Financial Hardship Waiver Certification

MB Docket No. 11-93

Dear Ms. Dortch:

Transmitted herewith, on behalf of KVMD Licensee Co., L.L.C., the licensee of Station KVMD(TV), Twentynine Palms, California, and pursuant to the Commission's Report and Order in *Implementation of the Commercial Advertisement Loudness Mitigation (CALM) Act*, 26 FCC Rcd 17222 (2011), is the licensee's Streamlined Financial Hardship Waiver Certification, requesting a renewal of its waiver.

Should there be any questions in regard hereto, please communicate with the undersigned.

Respectfully submitted,

Barry A. Friedman

Enclosure

# Before the **FEDERAL COMMUNICATIONS COMMISSION** Washington, D.C.

In the	Matter of	)	
-	mentation of the Commercial rtisement Loudness Mitigation (CALM)	) ) )	MB Docket No. 11-93
То:	The Secretary		
For:	The Chief		
	Media Bureau		

#### STREAMLINED FINANCIAL HARDSHIP WAIVER CERTIFICATION

KVMD Licensee Co., L.L.C. ("KVMD"), the licensee of Station KVMD(TV),
Twentynine Palms, California (the "Station"), acting pursuant to Section 2(b)(2) of the
Commercial Advertisement Loudness Mitigation Act ("CALM Act") and Paragraphs 52 and 53
and note 228 of the *Implementation of the Commercial Advertisement Loudness Mitigation*(CALM) Act, 26 FCC Rcd 17222 (2011) ("CALM Rules"), hereby certifies to the Federal
Communications Commission that it is in need of a renewal of the one-year delay in its required compliance with the CALM Rules and seeks such relief pursuant to the streamlined rules adopted by the Commission. In support thereof, KVMD states as follows:

KVMD filed a timely request, on September 21, 2012, seeking a one-year delay in its compliance with the CALM Rules.

KVMD submits that it meets the standard for being considered a "small broadcast station" for CALM Act and CALM Rules purposes. For calendar year 2012, the most recent full calendar year, the Station, an independent television station whose programming consists of primarily of foreign-language and religious programming, produced annual gross revenue of less

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than \$14 million. Owing to the size of its annual gross revenue, the Station qualifies as a small business under relevant standards and meets the test established in the CALM Rules for treatment as a small broadcast station.

KVMD also submits that it needs renewal of the one-ye r delay in obtaining equipment in order to avoid the financial hardship that would be imposed a ere it required to obtain the equipment needed to implement the CALM Rules. Attached hereto, as Exhibit A, is the equipment specifications received by KVMD in order to effect ompliance with the CALM Act. The acquisition of this equipment constitutes a financial hardship agiven the annual gross revenues and expenses associated with operation of the Station. A renewal of the one-year delay in KVMD having to acquire this equipment represents a reaningful limitation on the financial hardship that the CALM Act imposes on the Station.

Consequently, KVMD is entitled to a financial hardship waiver permitting it to receive renewal of the one-year delay in its CALM Act and CALM Rues compliance.

The undersigned certifies under penalty of perjury that the foregoing is true and correct.

Executed at Los Angeles, California on the 13th day of September, 2013.

Rc iald L. Ulloa

Pri sident

K<sup>T</sup> MD Licensee Co., L.L.C.

## EXHIBIT A

## **EQUIPMENT SHOWING**



ENSEMBLE S E

**PROPOSAL: 09111212GT** 

**DATE:** 9/11/2012

BY: glen

TERMS: See Below

FOB POINT: Origin

NAME: Ken Brown **COMPANY: KVMD** 

ADDRESS: 2323 Corinth Ave.

CITY/ST/ZIP: West Los Angeles, CA 90064 PHONE/FAX: (310)943-5288 (310)943-5299

EMAIL: kbrown@kjla.com

#### **ENSEMBLE DESIGNS PRICING PROPOSAL**

Item	Description		Unit Price	Total	
3RUFRM	Avenue 3RU Frame (accepts any 10 modules) Supports 3Gbp/s	1	\$995.00	\$	995.00
5020	Avenue Redundant Power for 3RU	1	\$449.00	\$	449.00
5030	Avenue 3RU System Control Module	1	\$700.00	\$	700.00
7555	Avenue HD/SD Video Processing Frame Sync	10	\$2,800.00	\$	28,000.00
9615	Avenue Audio Software Key for 7555, 9550	10	\$500.00	\$	5,000.00
9670	Avenue Audio AGC - Software Key	10	\$800.00	\$	8,000.00
9690	Avenue Audio Compliance Monitoring Software for use with 7660, 9600, 7555, 9550	3	\$425.00	\$	1,275.00
ļ.	Total System Price				\$44,419.00
	*ALL PRICING AND TERMS CONFIDENTIAL*				

TERMS:

Net 30 upon credit approval. 1% 10 Days 2% Prepay

TAX AND FREIGHT WILL BE ADDED TO THE INVOICE AMOUNT. SHIPMENT WILL BE VIA SURFACE UNLESS REQUESTED DIFFERENTLY.

THIS PROPOSAL AND SUBSEQUENT ORDER SUBJECT TO

ACCEPTANCE BY ENSEMBLE DESIGNS. PROPOSAL VALID 60 DAYS.

PLEASE SUBMIT ORDERS AND PAYMENT TO:

**ENSEMBLE DESIGNS** 

PO BOX 993

GRASS VALLEY, CA 95945

PLEASE FAX COPY TO: (310) 765-6343 or EMAIL COPY TO: piper@piperdigital.com

Thank you

Glen Thompson Piper Digital

Manufacturer's Representative email: glen@piperdigital.com